

**Langston, Lee F. (TAX)**

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**From:** Keneally, Kathy <kkeneally@jonesday.com>  
**Sent:** Thursday, September 9, 2021 4:44 PM  
**To:** Langston, Lee F. (TAX); Smith, Corey (TAX); Magnani, Christopher (TAX)  
**Cc:** Varnado, Jason S.; Loonam, James P.; Druce, Georgina N.; Maloney, Conor G.; O'Connor, Colleen E.; Mankodi, Esha  
**Subject:** RE: US v. Brockman: privilege logs

All,

We have reviewed your letters dated September 7, 2021, concerning 42 documents included on a privilege log that we provided to you on September 4, 2020, and an additional 4 documents included on a privilege logs provided to you on September 6, 2021. It is our position that all necessary information is provided on those privilege logs.

Kathy

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**From:** Langston, Lee F. (TAX) <Lee.F.Langston@usdoj.gov>  
**Sent:** Tuesday, September 7, 2021 9:41 PM  
**To:** Keneally, Kathy <kkeneally@jonesday.com>; Smith, Corey (TAX) <corey.smith@usdoj.gov>; Magnani, Christopher (TAX) <Christopher.Magnani@usdoj.gov>  
**Cc:** Varnado, Jason S. <jvarnado@jonesday.com>; Loonam, James P. <jloonam@jonesday.com>; Druce, Georgina N. <gdruce@JonesDay.com>; Maloney, Conor G. <cmaloney@jonesday.com>; O'Connor, Colleen E. <colleenconnor@jonesday.com>; Mankodi, Esha <emankodi@jonesday.com>  
**Subject:** RE: US v. Brockman: privilege logs

**\*\* External mail \*\***

Kathy,

Attached please find a letter that identifies each of the documents to which we have concerns.

Sincerely,

**Lee Langston**  
Trial Attorney  
Department of Justice Tax Division  
Western Criminal Enforcement Section  
202-353-0036

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**From:** Keneally, Kathy <[kkeneally@jonesday.com](mailto:kkeneally@jonesday.com)>  
**Sent:** Tuesday, September 7, 2021 8:48 PM  
**To:** Langston, Lee F. (TAX) <[Lee.F.Langston@tax.USDOJ.gov](mailto:Lee.F.Langston@tax.USDOJ.gov)>; Smith, Corey (TAX) <[Corey.Smith@tax.USDOJ.gov](mailto:Corey.Smith@tax.USDOJ.gov)>; Magnani, Christopher (TAX) <[Christopher.Magnani@tax.USDOJ.gov](mailto:Christopher.Magnani@tax.USDOJ.gov)>  
**Cc:** Varnado, Jason S. <[jvarnado@jonesday.com](mailto:jvarnado@jonesday.com)>; Loonam, James P. <[jloonam@jonesday.com](mailto:jloonam@jonesday.com)>; Druce, Georgina N.

<[gdruce@JonesDay.com](mailto:gdruce@JonesDay.com)>; Maloney, Conor G. <[cmaloney@jonesday.com](mailto:cmaloney@jonesday.com)>; O'Connor, Colleen E. <[colleenconnor@jonesday.com](mailto:colleenconnor@jonesday.com)>; Mankodi, Esha <[emankodi@jonesday.com](mailto:emankodi@jonesday.com)>

**Subject:** US v. Brockman: privilege logs

Lee,

We asserted privileges on a document basis, not on a party basis. Please identify the documents as to which you have concerns.

Best,  
Kathy

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**From:** Langston, Lee F. (TAX) <[Lee.F.Langston@usdoj.gov](mailto:Lee.F.Langston@usdoj.gov)>

**Sent:** Tuesday, September 7, 2021 2:47 PM

**To:** Druce, Georgina N. <[gdruce@JonesDay.com](mailto:gdruce@JonesDay.com)>; Magnani, Christopher (TAX) <[Christopher.Magnani@usdoj.gov](mailto:Christopher.Magnani@usdoj.gov)>

**Cc:** Smith, Corey (TAX) <[corey.smith@usdoj.gov](mailto:corey.smith@usdoj.gov)>; Garrett Evan W <[Evan.Garrett@ci.irs.gov](mailto:Evan.Garrett@ci.irs.gov)>; Keneally, Kathy <[kkeneally@jonesday.com](mailto:kkeneally@jonesday.com)>; Loonam, James P. <[jloonam@jonesday.com](mailto:jloonam@jonesday.com)>; Varnado, Jason S. <[jvarnado@jonesday.com](mailto:jvarnado@jonesday.com)>

**Subject:** UCSH Privilege Logs

**\*\* External mail \*\***

Counsel,

Attached please find a letter regarding the UCSH Privilege Logs.

Sincerely,

**Lee Langston**

Trial Attorney

Department of Justice Tax Division

Western Criminal Enforcement Section

202-353-0036

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